

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: BENICAR (OLMESARTAN)
PRODUCTS LIABILITY
LITIGATION**

THIS DOCUMENT RELATES TO
ALL CASES

MDL No. 2606

Master Case No. 15-2606 (RBK/JS)

Hon. Robert B. Kugler, U.S.D.J.

Hon. Joel Schneider, U.S.M.J.

**NOTICE OF MOTION
TO EXCLUDE THE TESTIMONY
OF PLAINTIFFS' EXPERTS DRs.
DANIEL LEFFLER AND
BENJAMIN LEBWOHL**

PLEASE TAKE NOTICE that on May 15, 2017 at 9:30 a.m., or as soon thereafter as counsel may be heard, Drinker Biddle & Reath, LLP, counsel for defendants Daiichi Sankyo, Inc., Daiichi Sankyo US Holdings, Inc., Daiichi Sankyo Co., Ltd., Forest Laboratories, Inc., now known as Forest Laboratories, LLC, Forest Pharmaceuticals, Inc., and Forest Research Institute, Inc. (collectively, "Defendants"), will move before the Honorable Robert B. Kugler, U.S.D.J., in the United States District Court for the District of New Jersey, for an order to exclude the testimony of plaintiffs' experts Drs. Daniel Leffler and Benjamin Lebwohl. In support of this application, Defendants will rely on the attached Brief in Support of the Motion to Exclude, and Certification of Daniel B. Carroll, Esq. and attached

exhibits, submitted herewith.

Dated: March 31, 2017

Respectfully submitted,

/s/ Susan M. Sharko

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